

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Docket No. 16-CR-40025-TSH
(1) IVAN CRUZ-RIVERA and)	
(2) CARLOS JIMENEZ)	
)	
Defendants.)	
)	

WITNESS LIST FOR DEFENDANT CARLOS JIMENEZ

The defendant, Carlos Jimenez (“Jimenez”) by and through undersigned counsel, hereby respectfully moves this Honorable Court to provide the jury with a limiting instruction prior to the admission of the testimony to which it relates. Specifically, the government provided defense counsel notice, pursuant to Fed. R. Evid. 404(b)(2)(A), that the “cooperating witness may reference interactions between Ivan Cruz-Rivera and the cooperating witness prior to October 4, 2013, including certain interactions in 2012 and 2013 during which Cruz-Rivera distributed heroin to the cooperating witness.” The defendant respectfully requests the jury be instructed this evidence is introduced solely as to how it may or may not relate to Mr. Cruz-Rivera and it may not be considered, whatsoever, during its deliberations with respect to Jimenez. Undersigned counsel respectfully request that the government advise the Court at sidebar prior to eliciting this testimony.

Dated: November 19, 2018

Respectfully submitted,
CARLOS JIMENEZ
By and through his attorneys,

/s/ R. Bradford Bailey
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Certificate of Service

I, R. Bradford Bailey, hereby certify that on this the 19th day of November, 2018, I caused a true copy of the foregoing motion to be served upon all necessary parties to this matter by virtue of electronically filing the same via the CM/ECF system.

/s/ R. Bradford Bailey
R. Bradford Bailey, Esq.